EXHIBIT 2

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THEFACEBOOK, INC.,)
Plaintiff,)
vs.) NO. 1 05 CV 047381
CONNECTU LLC,)
Defendant.)

CONFIDENTIAL

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION

OF

JOHN TAVES

8:58 a.m. - 4:49 p.m.

January 29, 2007

719 Second Avenue, Suite Number 900

Seattle, Washington

Joan E. Kinn, CCR, RPR

Court Reporter

A. No. 09:37:56
Q. Okay. Have you ever seen this list of topics in Exhibit A? 09:37:57 09:38:00
A. I think so. 09:38:03
Q. Okay. Number 2 says, work performed for ConnectU; do you see that? 09:38:04 09:38:08
A. Yeah. 09:38:10
Q. Are you prepared today to talk about work that you performed for ConnectU? 09:38:10 09:38:13
A. Yeah. 09:38:15
Q. Okay. So you started in December 2004, correct? 09:38:16 09:38:21
A. Yeah. 09:38:21
Q. Okay. What were you working on at the time? 09:38:22
MR. MOSKO: Question is vague. 09:38:26
A. You mean what did we work on for ConnectU? 09:38:28
Q. Mm-hm. 09:38:32
A. I'm not sure. 09:38:33
Q. Okay. So the whole time you worked, the whole time you worked for ConnectU, why don't you just give me a list of things you worked on, maybe that will be easier to do it that way. 09:38:35 09:38:38 09:38:41 09:38:45
A. I'm not sure what we have worked on for them, I don't know. 09:38:46 09:38:50
Q. You're supposed to be the person most 09:38:50

A. Yeah, go ahead. 10:04:42
Q. What is this? 10:04:44
A. I think this was i2Hub and ConnectU's 10:04:48
thoughts on how to share their, you know, two services 10:04:54
and contribute marketing. 10:05:00
Q. Okay. And did you review this at the time 10:05:03
you received it? 10:05:05
A. I think so, yeah. 10:05:05
Q. Do you recall if you asked Cameron any 10:05:07
questions about it? 10:05:12
A. I don't remember, but I probably would have. 10:05:12
Q. Okay. Would anybody else have talked to 10:05:14
Cameron about this document? 10:05:17
MR. MOSKO: On behalf of Pacific Northwest 10:05:19
Software? 10:05:20
A. Winston and Joel. 10:05:22
Q. Winston and Joel? 10:05:24
A. Winston and Joel. 10:05:25
Q. Okay. And why Winston? 10:05:27
A. Well, I don't remember specifically the 10:05:36
timing of all these things, but Winston was working on 10:05:38
ConnectU. Whether he was working on ConnectU at exactly 10:05:43
this time, I don't know, but I'm just assuming that it 10:05:47
would have been Winston. 10:05:49
Q. But this is -- 10:05:51

A. He was the primary developer for ConnectU. 10:05:51
Q. Okay, sorry to interrupt you. 10:05:54
Okay, and so this might have been a project 10:05:56
he would have worked on for ConnectU while working at 10:05:57
Pacific Northwest? 10:06:02
A. Right. 10:06:02
Q. Okay, great. If you look at the second page. 10:06:03
A. Mm-hm. 10:06:07
Q. It has a section called CU Modifications more 10:06:08
technical. 10:06:12
A. Mm-hm. 10:06:13
Q. Is that, to your recollection, is that just 10:06:14
modifications to the existing site that ConnectU wanted 10:06:23
Pacific Northwest to do; do you know? 10:06:27
MR. MOSKO: Calls for speculation. 10:06:31
A. So say that question again, because this -- 10:06:40
Q. Okay, so let's start at the beginning then, 10:06:43
maybe this will make it more clear, Mr. Taves. 10:06:45
A. Okay. 10:06:48
Q. I don't want to confuse you. 10:06:48
A. Okay. 10:06:49
Q. So this is an overview, it looks like an 10:06:50
integration spec that Cameron sent to you. 10:06:53
A. Mm-hm. 10:06:55
Q. And this looks like it outlines the project 10:06:56

the client talks to? 10:13:07
MR. MOSKO: Calls for speculation and lacks foundation. 10:13:09 10:13:11
A. We pass it around quite a bit. 10:13:11
Q. Okay, so there's not -- there's not sort of like a team lead and then -- 10:13:14 10:13:16
A. No. 10:13:17
Q. Okay. And what is your role then with the company? 10:13:18 10:13:21
MR. MOSKO: Generally or in this instance? 10:13:21
Q. Do you understand the question? 10:13:23
A. Well, I'm the -- I'm the CEO, the president, but, you know, Mike and I are fairly equal, and so we team up to make the major decisions. 10:13:24 10:13:34 10:13:40
Q. Okay, it's a fairly small company, right? 10:13:42
A. Yes. 10:13:45
Q. So as the CEO, what are your day-to-day responsibilities? 10:13:46 10:13:50
A. Anything I feel like doing. I mean I worry about the books, I worry about who we employ, I worry about the customers, I worry about the -- 10:13:50 10:13:55 10:13:58
Q. Okay, do you do any development work yourself? 10:14:01 10:14:03
A. Yeah, some. 10:14:04
Q. And did you do any development work for 10:14:05

ConnectU? 10:14:07
A. No. 10:14:08
Q. Who did that? 10:14:09
A. The bulk of it was Winston. 10:14:10
Q. Okay. 10:14:12
A. Joel did some. I think there was others that did a little bit, but I can't remember the extent of all of them. 10:14:13 10:14:16 10:14:20
Q. Okay. Did Wayne Chang do any? 10:14:20
A. I don't think so. 10:14:23
Q. Okay. 10:14:25
A. Could be wrong. 10:14:26
Q. Did you have any interaction with iMarc, a company called iMarc, with regard to your work -- 10:14:36 10:14:51
A. Yeah. 10:14:53
Q. -- with ConnectU? 10:14:53
MR. MOSKO: Let her finish the question before answering. 10:14:54 10:14:56
Q. So you did, okay. Who at iMarc did you work with or talk to? 10:14:57 10:15:00
A. I can't remember his name. 10:15:02
Q. Mark Pierrat? 10:15:05
A. That sounds familiar. There might have been another name too. 10:15:08 10:15:11
Q. Dave Tufts? 10:15:13

Q. Okay. How would you describe your management style in terms of the people who work for you? 10:45:16 10:45:22
MR. MOSKO: The question is vague, overbroad, and uncertain. 10:45:24 10:45:27
A. You would have to be more specific, I, you know. 10:45:29 10:45:32
Q. Are you a micro manager, do you watch what they do? 10:45:33 10:45:36
A. I don't think I'm a micro manager. 10:45:37
Q. Do you have regular status meetings? 10:45:40
A. No, not regular. 10:45:44
Q. Would you have meetings to talk with your team working on a particular product or project to see how it's going? 10:45:45 10:45:58 10:45:58
MR. MOSKO: Calls for speculation and lacks foundation. 10:45:58 10:45:59
A. Yeah, we do have meetings. 10:46:00
Q. Do you expect regular updates from your developers on how projects are going? 10:46:02 10:46:05
MR. MOSKO: Vague and uncertain. 10:46:07
A. I don't expect, I hope. 10:46:09
Q. Do you get regular updates from your developers? 10:46:11 10:46:14
A. No, not regular. I get updates. 10:46:15
Q. You get updates. If something significant is 10:46:18

happening in a project, do you generally learn about it? 10:46:23
A. Well, the ones I haven't learned about I don't know, so. 10:46:28 10:46:30
Q. Would you expect your developers to tell you significant things that are going on in their projects? 10:46:31 10:46:34
A. I would hope so. 10:46:36
Q. Okay. 10:46:38
A. But I don't expect it. 10:46:38
Q. And if and when you have status meetings with your staff, what kinds of things do you talk about? 10:46:40 10:46:43
MR. MOSKO: The question is hopelessly vague and overbroad and uncertain. 10:46:46 10:46:48
A. We talk about all sorts of things. 10:46:52
Q. Okay. So let's take ConnectU for example, did you have any staff meetings regarding ConnectU's projects? 10:46:56 10:46:59 10:47:03
MR. MOSKO: Vague as to time. 10:47:03
A. I'm sure we have had meetings. 10:47:05
Q. Do you recall any of them? 10:47:07
A. No. I mean the definition of meeting, you know, we exchange E-mails, we do chats, there's nothing any -- there's nothing formal about it. Communication happened all over the place, so it's just, yeah, I mean you got the E-mails. 10:47:15 10:47:21 10:47:26 10:47:30 10:47:39
Q. But you're generally kept up to date on 10:47:42

Q. Okay. 11:10:04
What did you mean when you said, we've got 11:10:06
nothing interesting, go bark up another tree? 11:10:09
A. Well, with Winston gone, I didn't think we 11:10:12
had any information for you. Winston is the answers as 11:10:16
far as I'm concerned. 11:10:19
Q. Why Winston? 11:10:20
A. He did the majority of the work for ConnectU. 11:10:22
Q. But ConnectU hired Pacific Northwest Software 11:10:26
to do the work, correct? 11:10:29
A. Mm-hm. 11:10:30
Q. Do you have any sense for how many documents 11:10:34
you produced? 11:10:37
A. No. 11:10:39
Q. Okay. When you say we've got nothing 11:10:40
interesting, what do you mean by that? 11:10:45
A. Your -- I don't think I can contribute any 11:10:56
information as to anything about the Social Butterfly or 11:11:01
Facebook importer or whatever it is, because Winston was 11:11:05
the major developer for ConnectU, and he's not an 11:11:11
employee, so, you know, I don't have the information. 11:11:17
Q. Okay. So the other tree you wanted us to 11:11:28
bark up is Winston? 11:11:28
A. I don't care where you bark, I was just 11:11:28
getting tired of paying lawyers to answer these 11:11:30

Q. Do you know what he's talking about? 11:46:46
MR. MOSKO: Calls for speculation, the 11:46:49
document speaks for itself. 11:46:51
A. Not really, no. 11:46:55
Q. Okay. He says, the bulk of our time was 11:46:58
spent on it; do you see that? 11:47:01
A. Mm-hm. 11:47:03
Q. If the bulk of Winston's time was spent on a 11:47:05
project, would you not be aware of it? 11:47:09
MR. MOSKO: Calls for speculation and lacks 11:47:12
foundation and assumes facts not in evidence. 11:47:14
A. Okay, on this sentence I'm not sure who he's 11:47:28
referring to as our. And then specifically on your 11:47:28
question, you said if Winston worked on something, would 11:47:32
I not know about it, could you say that again? 11:47:37
Q. I think I will actually. 11:47:40
A. Okay. 11:47:41
Q. I'm trying to figure out who manages these 11:47:42
projects, because if Wayne -- if Winston spent a great 11:47:46
deal of time on this product, it seems to me because 11:47:51
your company is small that you would know what Winston 11:47:55
is doing. I'm doing the same thing you did. Were you 11:47:59
not aware of the projects he was working on? 11:48:02
MR. MOSKO: Let me object to the question as 11:48:05
lacking in foundation and overbroad and substantially 11:48:07

misstating the document and misinterpreting the document. 11:48:11 11:48:17

A. You're correct, I was not aware of the details of what Winston is working on. I knew that he was working on ConnectU and that they were paying the bills. 11:48:17 11:48:20 11:48:24 11:48:27

Q. And that's all you were concerned about? 11:48:28

A. Pretty much. 11:48:30

Q. So do you know what Wayne is referring to that -- go back to the first page, if you will, please. 11:48:44 11:48:48

A. Mm-hm. 11:48:50

Q. The sentence where he says that Social Butterfly now illegally uses logins and passwords procured from ConnectU users, do you know what he's talking about there? 11:48:51 11:48:54 11:48:58 11:49:01

MR. MOSKO: Objection, question calls for speculation, lacks foundation, and is substantially incomprehensible. 11:49:02 11:49:05 11:49:09

A. I don't know the details. 11:49:19

Q. Why was Wayne sending you bullet, I'm assuming he means bullet points, but why was he sending you this, do you know, did you ask him for it? 11:49:29 11:49:33 11:49:37

MR. MOSKO: Compound, answer the latter question I think is the one she's asking for. 11:49:42 11:49:45

A. Why did he send it? 11:49:47

Q. No, did you ask him for it? 11:49:49
A. No, I didn't ask him to send me this. I -- I don't know. 11:49:51 11:49:53
Q. Did you have a discussion with him that preceded this E-mail about these issues? 11:49:53 11:49:56
MR. MOSKO: Overbroad. 11:50:00
A. Could be. 11:50:01
Q. Would you have asked him to put in an E-mail the bullet points? 11:50:04 11:50:08
MR. MOSKO: Calls for speculation, lacks foundation. 11:50:10 11:50:12
A. It seems unlikely. It seems more like he was seeking out my help than I was encouraging him to seek it out. 11:50:13 11:50:17 11:50:21
Q. Did you talk to anyone at ConnectU about these issues? 11:50:21 11:50:24
MR. MOSKO: Lacks foundation. 11:50:25
Q. You, Mr. Taves. 11:50:26
MR. MOSKO: Hold on one second. 11:50:28
The question lacks foundation and is overbroad. 11:50:30 11:50:32
A. If these issues are Wayne's relationship with Cameron, yes, I did, you know, E-mail and speak with Cameron and Wayne about it. 11:50:35 11:50:39 11:50:46
Q. What did you E-mail Cameron about? 11:50:51